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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|---------------------------------------|
| AC2T, Inc., d/b/a Spartan Mosquito, | : | |
| | : | |
| Plaintiff, | : | Civil Action |
| | : | Case Number: 2:19-cv-05946-RBS |
| | : | |
| v. | : | Jury Trial Demanded |
| | : | |
| Colin Purrington, | : | |
| | : | |
| Defendant. | : | |
| | : | |

**MOTION FOR ORDER GOVERNING EXCHANGE OF CONFIDENTIAL
DOCUMENTS AND INFORMATION IN DISCOVERY**

Plaintiff respectfully requests that the Court enter a confidentiality order to govern the exchange of confidential documents and information in discovery. This order meets the Third Circuit's standard in *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 790 (3d Cir. 1994). Neither party is a public official or government entity. The confidential documentation involves testing and research on a proprietary product. The scope of confidentiality is not defined more broadly than necessary: for example, proprietary research, development, trade secrets, financial data, and personal identifiers. This confidentiality order has minimal to zero affect on the public's access. The Court will be able to determine the merits of the case publicly based on pleadings, documents, and arguments available on the docket. Rather, this is an order only on documentation and information exchanged pursuant to discovery, and only requires sealing and

redaction if a party files a confidential document or describes it in a filing. For these reasons, the Court should enter the proposed order to govern the exchange of confidential documents and information in this case.

Plaintiff sought Defendant's position on this matter but has received no response as of the time of this filing.

Respectfully submitted,

/s/ Evan L. Frank
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